

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI

In re Melissa Lamkin, )  
 )  
 ) Case No. 14-41460-KSS  
 ) Chapter 13  
Debtor. )  
 )  
 )

**DEBTOR'S OBJECTION TO PROOF OF CLAIM NUMBER TEN (10) OF  
WEST COMMUNITY CREDIT UNION**

Melissa Lamkin ("Debtor") through her counsel, Michael J. Watton and the Watton Law Group, hereby objects to the proof of claim number Ten (10) of West Community Credit Union ("Creditor") in this bankruptcy case.

Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code on March 4, 2014. On April 25, 2014, Creditor filed a secured proof of claim for \$11,770.09, representing the value of the collateral as of the date the bankruptcy case was filed. As of the date of the petition filing, the Chapter 13 Plan lists the value of the collateral as \$7,475.00. Attached to this objection is the NADA value for Debtor's vehicle (see Exhibit A).

Wherefore, Debtor respectfully requests that this Court enter an Order stating that Creditor's secured claim shall total \$7,475.00 plus applicable interest at 4.75% with the remainder of the balance treated as a general unsecured, non-priority claim and for such further relief as is just and appropriate.

**PLEASE TAKE NOTICE: ANY RESPONSIVE PLEADING IN OPPOSITION TO  
THIS OBJECTION TO CLAIM MUST BE FILED IN WRITING NO LATER THAN  
TWENTY-ONE (21) DAYS AFTER THE DATE OF SERVICE OF THIS OBJECTION AS  
SHOWN ON THE CERTIFICATE OF SERVICE. THE RESPONSE MUST BE  
IMMEDIATELY SERVED UPON THE UNDERSIGNED. IF NO RESPONSE IS FILED,**

**THE COURT MAY GRANT THIS OBJECTION WITHOUT FURTHER NOTICE ON  
EXPIRATION OF THE RESPONSE PERIOD.**

Date: June 20, 2014

/s/ Lindsay E. Davis (for)

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Lindsay E. Davis, Esq.  
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Original filed electronically this  
June 20, 2014 with:

Clerk  
U.S. Bankruptcy Court  
111 South 10<sup>th</sup> Street, 4<sup>th</sup> Floor  
St. Louis, MO 63102

Copies of the foregoing mailed or sent electronically  
if the party named accepts electronic service  
this June 20, 2014 to:

West Community Credit Union  
4161 Highway K  
O Fallon, MO 63368

John V. LaBarge, Jr.  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143

Ms. Melissa Lamkin  
235 Filmore Street  
De Soto, MO 63020

/s/ Elizabeth Alaniva-Hazaz, Paralegal

Lamkin  
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